

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TENNESSEE  
GREENEVILLE DIVISION**

**B.P., et al.,**

**Plaintiffs,**

**v.**

**No: 2:23-cv-00071-TRM-JEM**

**CITY OF JOHNSON CITY, TENNESSEE, et al.,**

**Defendants.**

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**NOTICE OF LODGING DOCUMENTS UNDER SEAL**  
**TO THE COURT AND ITS ATTORNEYS OF RECORD:**

Plaintiffs hereby give notice that they are provisionally lodging under seal Exhibits 1 and 3-9 to the Declaration of Vanessa Baehr-Jones in support of Plaintiffs' Reply in Support of Plaintiffs' Motion to Compel Production of (1) Defendants' Financial Records and (2) the Real Estate Contract Between City Manager Cathy Ball and Sean Williams ("Plaintiffs' Reply"). Exhibit 1 and 3-9 are photographs taken by Johnson City Police Department ("JCPD") officer(s) in Female 3's investigation. Plaintiffs are filing these exhibits provisionally under seal because, as set forth in the accompanying declaration, counsel for Defendants assert that these materials relate to an ongoing investigation.

Plaintiffs see no legal basis for continuing to seal JCPD case notes and files relating to Sean Williams' crimes, particularly where all sensitive survivor information has been redacted. To the contrary, continuing to litigate this case behind closed doors undermines the public function of the Court and denies the survivors, the Class Members, and the community the accountability they deserve—accountability which is long overdue. *See Shane Grp., Inc. v. Blue Cross Blue Shield of Michigan*, 825 F.3d 299, 305 (6th Cir. 2016) ("[I]n class actions—where by

definition ‘some members of the public are also parties to the [case]’—the standards for denying public access to the record ‘should be applied ... with particular strictness.’”).

Nor have Defendants articulated a basis as to how these exhibits would jeopardize any ongoing investigation into Williams. There are now images and videos of Williams sexual assaults; it is beyond any doubt that Williams sexually assaulted his victims. There is nothing in any redacted police report, and certainly nothing in these photographs, that could undermine the strength of that evidence and somehow “jeopardize” the investigations here. “[G]eneral routine information” about an investigation is “insufficient to justify indefinite secrecy.” *United States v. Se. Eye Specialists, PLLC*, 586 F. Supp. 3d 787, 793 (M.D. Tenn. 2022). Particularly here, where B.P. and the other victims have been waiting years for their cases to be prosecuted, there is no basis to continue to hide police reports and case files from the public.

Plaintiffs therefore request the Court decline to keep Exhibits 1 and 3-9 under seal.

Dated: July 19, 2024

Respectfully submitted,

Advocates for Survivors of Abuse PC

/s/ Vanessa Baehr-Jones

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*Pro Hac Vice*

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**CERTIFICATE OF SERVICE**

I HEREBY certify that a copy of the foregoing has been filed and served via the court's electronic filing system on July 19, 2024 to counsel of record:

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